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## EG&G ROCKY FLATS

DE ORDER# 5400 1

14 R F 09761 ROCKY FLATS, INC

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October 10, 1994

94-RF-09761

Shirley Olinger Environment, Safety, and Health DOE, RFFO

COMMENTS FROM COLORADO DEPARTMENT OF PUBLIC HEALTH & ENVIRONMENT (CDPH&E) - TGH-388-94

In informal comments dated September 6, 1994, on the Pond Water Management Interim Measures/Interim Remedial Actions document, the CDPH& E made the following statement

DOE's preference to intentionally route hazardous waste to the STP coupled with the limited NPDES analytical suite, render its direct discharge inappropriate at this time (silver discharge on 7/8/94 is a good example)

We have attached a copy of this comment which we believe represents a serious allegation on the part of the State which needs to be quickly addressed. We believe the suggestion that it is "DOE's preference" to route hazardous waste to the Rocky Flats Sewage Treatment Plant (STP) is entirely untrue. It must be made clear to the State that EG&G Rocky Flats, Inc. (EG&G) never has intentionally "routed hazardous waste" to the STP. All non-process non-domestic waste streams discharged to the sanitary collection system have been identified and included in a number of submittals to the Environmental Protection Agency also reviewed by the State. None of these waste streams is a hazardous waste. Moreover, the July 8 incident cited in the State's comments was an accidental release of approximately eight gallons of photographic solution to a floor drain, this was not intentional and the characterization of the solution as a "hazardous waste" is still in question. EG&G strictly controls discharges to the sanitary collection system such that no hazardous wastes are "intentionally routed" to the STP.

EG&G urges DOE, RFFO to insist that the State of Colorado remove this suggestion of improper conduct in their final comment. Unless corrected, comments such as these will remain in the public record of this project and could negatively influence future negotiations relating to surface water management at this Site.

-SSIFICATION

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SIGNATURE

FEPLY TO REP CC NO

 T G Hedahl, Director Waste Management

REF fm

Orig and 1 cc - S Olinger

Attachment As Stated

CC

J Roberson - DOE, RFFO
M Silverman - DOE, RFFO
ADMIN RECORD

A-0U06-000331

## Colorado Department of Public Health and Environment Informal Comments Draft Chapter 5, Pond Water IM/IRA

- 1) We have previously expressed our reluctance to consider flow-through es a viable short-term alternative. We continue to feel that an uncontrolled/undetected release getting through the system presents an unacceptable risk, no matter how small the probability of such a release. We feel the only real short-term options are those that maintain and improve the batch isolation system, including
  - improving dam integrity to enable increased volume retention decreasing discharge cycle requirements by incorporating new analytical methods with quicker turnaround times
    justifying and improving where possible, maximum draw down rates
    incorporating water consumptive and recycling measures to reduce the amount of influent and stored waters in the pond system, can be applied to all sources of water entering the pond system.

Several of these can be implemented immediately and inexpensively

DOE has much work shead before a flow-through system can be "phased in" DOE's preference to intentionally route hazardous wastes to the STP, coupled with the limited NPDES analytical suite, render its direct discharge inappropriate at this time (silver discharge on 7/8/94 is a good example). There is no real time analytical monitoring equipment for meaningful indicator parameters, namely Pu/Am. As a result, any variation on the flow through scheme really isn't a short-term option. Despite this, four of the six alternatives presented in your submitted, which are clearly identified as short term in nature, are flow-through

DOE has not by any means exhausted its options to maintain and improve the oatch process. Flow-drough will be considered only when DOE is left with no other choices.

- 2) The matrix is a good thought, and we support a method that would allow an unbiased evaluation of elternatives. If DOE chooses to use this matrix, we require a detailed justification of the ranking factors assigned to cach criteria. It seems though, that the evaluation criteria are weighted in such a way as to favor the flow-through alternatives. Only criteria I and 6 support batching, with criteria 2, 3, 4, and 5 clearly supporting flow-through. Simple algebra shows which way this is headed. We would argue that achieving the Segment 4 standards assures protection of functional ecologies (and that Segment 4 standards should have a much higher weighting factor), and that criteria 4 and 5 are identical. We reserve the right to reject an alternative chosen on the basis of an evaluation mechanism that is predispositioned
- 3) Any facility that manages RCRA hazardous waste will be required to meet the substantive requirements of RCRA, including (but not limited to) secondary containment.
- 4) The costs associated with treatment and monitoring upgrades will far exceed implementation of measures listed in comment number 1. We encourage DOE to pursue simple, non-capital intensive alternatives
- 5) Who requires a formal biological assessment of the selected alternative? What ecosystem is being protected? Has DOE considered that the current batching configuration is more like the ambient conditions in existence before DOE was ever there (intermittent flow)? It will be difficult to prove a continuous flow system is better for functional ecologies when such conditions have never occurred there
- 6) All off-spec waters, be they spills or storm water, should go to the tankage as the first choice Coordination with the Industrial Area IM/IRA will be necessary on this point.